

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT DEDMON,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO.
	§	
v.	§	4:21-CV-03371
	§	
SHELL EXPLORATION &	§	
PRODUCTION	§	
COMPANY AND SHELL TRADING	§	
SERVICES COMPANY,	§	
	§	
<i>Defendants</i>	§	

DEFENDANTS’ PROPOSED VOIR DIRE QUESTIONS

Defendants Shell Exploration & Production Company and Shell Trading Services Company (“Defendants” or “Shell”) submit the following proposed Voir Dire Questions.

WORKPLACE EXPERIENCES

1. In the lawsuit, Plaintiff claims that Shell treated him less favorably on the basis of his race and color (Black/African American) than White employees. Does any member of the panel believe you have been a victim of discrimination in the workplace because of your race or color?
2. Has any member of the panel ever thought that they were paid unfairly? If so, do you believe your employer’s decision was based upon your race or color?
3. Has anyone ever applied for a promotion they did not get? If so, do you believe your employer’s decision was based upon your race or color?
4. May I see the hands of those on the panel who have experience in supervising co-workers?

5. May I see the hands of those on the panel who have participated in evaluating the performance of other employees at their place of business or employment?

6. May I see the hands of those on the panel who have participated in setting compensation for other employees at their place of business or employment?

7. Has any member of the panel ever asserted a claim of wrongful or discriminatory conduct against an employer or former employer?

8. Has any member of the panel had the experience of a family member, friend, or co-worker asserting a claim of wrongful or discriminatory conduct by an employer or former employer?

9. Has any member of the panel been a witness in a lawsuit in which a claim of workplace discrimination was asserted?

10. Has any member of the panel been a plaintiff or defendant in a lawsuit?

Plaintiff or Defendant?

What kind of case?

11. Has any member of the panel been a juror in a civil case?

What kind of case?

Did the jury side with the plaintiff or defendant?

EXPERIENCES WITH SHELL

12. Has any member of the panel ever worked for either of the Shell Defendants or any other Shell entity?

13. Has any member of the panel personally applied for a job with any of the Shell Defendants or any other Shell entity? Did you get the job?

14. Does any member of the panel have a family member or friend who has ever worked for or with the Shell Defendants or any other Shell entity?

15. Does any member of the panel have a family member or friend who applied for a job with the Shell Defendants or any other Shell entity?

16. Has any member of the panel had an experience with the Shell Defendants or any other Shell entity – that suggests you cannot be fair to Shell?

17. Let's expand the question to corporations in general.

Has any member of the panel had a bad experience with a corporation – any corporation – that makes you think that corporations are bad?

18. Has any member of the panel had an experience with a corporation – any corporation – that makes it difficult for you to be fair to a corporation?

FAMILIARITY / KNOWLEDGE OF PARTIES/LAWYERS/WITNESSES

19. The Plaintiff in the is Robert Dedmon. Does any member of the panel know or know of Mr. Dedmon?

20. Does any member of the panel know any member of Mr. Dedmon's family?

21. The lawyers for the Plaintiffs are Amy Gibson, David Wiley and Amanda Hernandez.

Does any member of the panel know:

- Any of these attorneys or any members of their families?
- Does any member of the panel have (or has any member of the panel had) any legal dealings with, for and against the Gibson Wiley PLLC firm? Or with the AH Law PLLC firm?

- Know anyone who works at either of these firms, either currently or in the past?

22. The law firm representing the Shell Defendants is Ogletree Deakins. The Ogletree Deakins lawyer is Marlene Williams.

Does any member of the panel know or know of Ms. Williams?

23. Has any member of the panel

- Have or had legal business with, for or against the Ogletree Deakins law firm?
- Know anyone who has worked at Ogletree Deakins currently or in the past?

24. Over the course of the trial, you may hear testimony from a number of witnesses in addition to Mr. Dedmon. Does any member of the panel know of the witnesses in the case [identified from witness lists]?

LEGAL PROCEEDINGS

25. In our legal system, the Plaintiff puts on his evidence first.

Does anyone feel they will have difficulty giving the Shell Defendants an opportunity to present its evidence before forming an opinion in the case?

26. The Plaintiff is an individual and the Defendants is business entities/corporations.

Does any member of the panel believe that an individual should have an advantage over a business entity/corporation disregarding what the evidence shows?

27. Does anyone on the panel feel like because someone files a lawsuit, he or she is entitled to get money from the defendant?

28. Does any member of the panel believe that if you were selected to serve on this jury, it would be difficult for you to decide the questions submitted to you solely on the basis of the evidence because of some feeling of sympathy you may feel for Plaintiff or Defendant?

29. Does any member of the panel know of anything in your background which, if it were known to Plaintiff or Defendant, might disqualify you from serving as an impartial juror in this case?

30. Is there any other reason about which I have not inquired that would present you from participating in a fair and impartial verdict in this case?

31. Is there any other information that you feel it is important for Plaintiff or Defendant to know about you but that you'd prefer to share privately?

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

/s/ Marlene C. Williams
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**ATTORNEY-IN-CHARGE FOR
DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Proposed Voir Dire has been served on all counsel of record via ECF on February 10, 2025.

/s/ Marlene C. Williams
Marlene C. Williams